

# STATE OF ALASKA

## DEPARTMENT OF COMMERCE AND ECONOMIC DEVELOPMENT

ALASKA PUBLIC UTILITIES COMMISSION

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May 21, 1998  
FCC


Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: CC Docket No. 96-45, DA98-872  
Comments of APUC

Dear Ms. Salas:

Enclosed are an original and five copies of the Comments of the Alaska Public Utilities Commission in response to Public Notice DA98-872.

Sincerely,

  
Sam Cotten, Chairman

No. of Copies rec'd  
List A B C D E

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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
Federal-State Joint Board on ) CC Docket No. 96-45  
Universal Service ) DA 98-872

**Comments of the  
Alaska Public Utilities Commission**

Date: May 21, 1998

Sam Cotten, Chairman  
Alaska Public Utilities Commission  
1016 West Sixth Avenue, Suite 300  
Anchorage, Alaska 99501

## **SUMMARY**

The Alaska Public Utilities Commission (APUC) strongly supports the federal universal service program that funds discounts and reduced rates for telecommunications services to schools, libraries, and rural health care providers. Discounted services are essential for bringing critical services and educational opportunities to rural areas of the country, including Alaska. At the same time the APUC recognizes that funding of discounted services to schools, libraries, and health care providers could impact telecommunications rates nationwide depending upon the amount funded. The amount of funding for these special services must be properly balanced against potential impacts on rates and universal service throughout the nation. The APUC therefore supports a conservative approach to this issue while there remains uncertainty under the new federal mechanism as to the availability of funding for universal service to high cost areas and the impact on rates. The APUC supports the modest first year reduction in school, library, and health care funding levels proposed by the Federal Communications Commission in DA 98-872. While supporting the proposal of DA 98-872, the APUC does not necessarily support the concept that universal service funding must somehow balance interstate access charge reductions.

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	CC Docket No. 96-45
Federal-State Joint Board on	)	
Universal Service	)	DA 98-872

**Comments of the  
Alaska Public Utilities Commission**

The Alaska Public Utilities Commission (APUC) welcomes the opportunity to respond to Public Notice DA98-872, released by the Federal Communications Commission (Commission) on May 13, 1998. This Public Notice requested comments on the Commission's proposal to revise the 1998 collection amounts for schools, libraries, and rural health care universal service support mechanisms.

**I. Funding telecommunications discounts for schools, libraries, and rural health care providers is essential to promote critical services and educational opportunities in rural areas of the country, especially Alaska.**

People in rural areas are dependent upon rural health care providers for critical emergency services. In Alaska, when a disaster occurs, the factors of distance, harsh climate, rugged terrain, and dependance on air travel make relief efforts at times uncertain and in all cases

costly. Emergency health care services are often limited to rural clinics, and many critical health care services are only available in urban areas of the state. For example, most rural Alaskans live outside the ground transportation radius and local calling area of a hospital. Alaskans in rural areas therefore rely heavily on rural clinics in times of emergency. Telecommunications services between the rural health care provider and the closest hospital or doctor are essential. Discounts for these telecommunications services will improve the ability of rural health care providers in Alaska to meet the critical needs of the community. The APUC therefore strongly supports discounted services to rural health care providers under the federal program.

Similarly, discounts for telecommunications services to schools and libraries is a significant factor promoting educational opportunities and the public welfare, especially in rural areas. For example, eighty-eight percent<sup>1</sup> of all cities and villages in Alaska are in isolated, rural areas that have extremely low population (under 1000 people). These communities, by their size and remoteness, normally do not have the local infrastructure

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<sup>1</sup>1990, Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, Alaska, Table II.

(e.g., large libraries, universities, business centers) available in urban areas. As another example, only Anchorage, Fairbanks, and Juneau public libraries have over 100,000 books and serials available for viewing.<sup>2</sup> Further complicating this situation is the fact that over ninety percent of all communities in Alaska, including the state capital, are not accessible by road. Therefore, rural residents do not have the option of driving to an urban center to conduct research, obtain information or gain access to broad educational opportunities.

Communications access through the Internet, facsimile service, and data transmission offers an important substitute for the lack of local information resources in isolated, rural areas of Alaska. Discounts for these services under the federal system would greatly improve the affordability of these telecommunications services to schools and libraries and are in the public interest.

Given the above the APUC strongly supports federal discounts for telecommunications services to schools, libraries, and rural health care providers.

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<sup>2</sup>Statistics of Alaska Public Libraries, FY 1992 and FY 1993, Table 2.

**II. Funding for services to schools, libraries and rural health care providers must be balanced against potential impact on rates and universal services.**

While there is a critical need for funding of discounted services to schools, libraries, and health care providers, care must be taken that funding levels for these services do not raise rates to unacceptable levels, compromising universal service as a whole. A conservative approach is important at this time while there remains uncertainty under the new federal mechanism as to the level of funding available and the demands placed on the universal service system to meet the requirements of both high-cost areas of the country and the schools, libraries, and health care providers. The APUC therefore supports a moderate approach to funding universal services to schools, libraries and health care providers during the first year of implementation. The APUC believes the reduction in first year funding proposed by the Commission is modest and still allows the neediest schools and libraries to receive the support they need. At the same time the proposal appears a reasonable first step given present uncertainties as to the effects on rates and universal service.

While supporting the end result proposed by the Commission, the APUC does not necessarily promote the concept that universal service funding must somehow balance

interstate access charge reductions.

**Conclusion**

The APUC believes that the national goal of universal service is best achieved by taking a moderate approach towards funding schools, libraries, and rural health care provider services at this time. The APUC therefore supports the reduction in collection amounts proposed by the Commission in DA 98-872.

RESPECTFULLY SUBMITTED this 21th day of May, 1998.

A handwritten signature in dark ink, appearing to read "Sam Cotten", is written over a horizontal line.

By: Commissioner Sam Cotten  
Chairman of the Alaska Public  
Utilities Commission



**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	CC Docket No. 96-45
Federal-State Joint Board on	)	
Universal Service	)	DA 98-872

**CERTIFICATION OF MAILING**

I, Barbara J. Miller, certify as follows:

I am an Administrative Supervisor in the offices of the  
Alaska Public Utilities Commission, 1016 West Sixth Avenue,  
Suite 400, Anchorage, Alaska 99501.

On May 21, 1998, I mailed copies of

**MOTION TO ACCEPT LATE-FILED COMMENTS  
AND  
COMMENTS OF THE ALASKA PUBLIC UTILITIES COMMISSION  
(Issued May 21, 1998)**

in the proceeding identified above to the persons indicated on the  
attached service list.

DATED at Anchorage, Alaska, this 21st day of May, 1998.

*Barbara J. Miller*

*Inasmuch as this filing includes mailings to all known interested persons and the list is 21 pages in length, in order to minimize copying and mailing costs, the service list herein is not included as part of this mailing. That list is a public record on file with the Commission. Persons interested in obtaining the list should contact the Commission at 1016 West Sixth Avenue, Suite 400, Anchorage, Alaska, 99501 or by calling 1-907-276-6222.*

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